

## **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**CASE NO. 1:12-cv-2296-TCB**

Securities and Exchange Commission,

Plaintiff,

vs.

Aubrey Lee Price, PFG, LLC, PFGBI,  
LLC, Montgomery Asset Management,  
LLC f/k/a PFG Asset Management,  
Montgomery Asset Management, LLC  
f/k/a PFG Asset Management,

Defendants.

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Genworth Life Insurance Company,  
Protective Life Insurance Company,  
Household Life Insurance Company,

Plaintiffs in Intervention,

vs.

Melanie E. Damian, as Receiver for the  
Estate of Aubrey Lee Price, PFG, LLC,  
PFGBI, LLC, Montgomery Asset  
Management, LLC f/k/a PFG Asset  
Management, Montgomery Asset  
Management, LLC f/k/a PFG Asset  
Management,

Defendant in Intervention.

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**RECEIVER'S RESPONSE TO HOUSEHOLD LIFE INSURANCE  
COMPANY'S FIRST SET OF INTERROGATORIES, REQUESTS FOR  
PRODUCTION, AND REQUESTS FOR ADMISSION**

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Defendant in Intervention, Melanie E. Damian, as Receiver for the Estate of Aubrey Lee Price, PFG, LLC, PFGBI, LLC, Montgomery Asset Management, LLC f/k/a PFG Asset Management (Florida limited liability company), Montgomery Asset Management, LLC f/k/a PFG Asset Management (Georgia limited liability company) (the "Receiver"), pursuant to Rule 33, 34, and 36 of the Federal Rules of Civil Procedure, hereby files her response to Household Life Insurance Company's First Set of Interrogatories, Requests for Production, and Requests for Admission dated June 5, 2014, and deemed served by agreement on June 7, 2014.

**INTERROGATORIES**

1. Identify all persons who assisted with the drafting of answers to these Interrogatories and describe each such person's role.

**RESPONSE:** The Receiver's special insurance counsel, Jason S. Mazer and Matthew L. Baldwin of the law firm of Ver Ploeg & Lumpkin, P.A., drafted these answers after consultation with the Receiver and her counsel, Kenneth D. Murena.

2. Identify all individuals with whom you communicated regarding whether or not Price was deceased following his disappearance on June 16, 2012.

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have since been spent or otherwise transferred to any third parties.

**RESPONSE:** Objection. This request is overbroad and seeks documents protected by the attorney-client privilege and work product immunity. Notwithstanding and subject to this objection, *see* Response to Request No. 12.

16. Produce all financial records of the Receivership, including checks, bank drafts, and bank statements, that relate to or reflect the cash and other assets currently held by you as part of the Receivership Estate.

**RESPONSE:** *See* Response to Request No. 14.

17. Produce the current curriculum vitae and publication list for each witness whom you have retained to testify as an expert at trial, together with any reports rendered by such experts.

**RESPONSE:** None at this time, though the Receiver reserves her right to supplement her expert witness list as necessary pursuant to the applicable Rules.

18. Produce all documents and correspondence you exchanged with any expert you retained to testify or consult in this litigation.

**RESPONSE:** None at this time.

### REQUESTS FOR ADMISSION

1. Admit that the Policy was only payable upon Price's death.

**RESPONSE:** Admitted that the Policy "was only payable" only upon the death of

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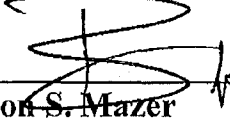
Price, denied that payment of the Policy's death benefits is not presently enforceable despite the parties' subsequent discovery that Price is alive.

2. Admit that you currently have sufficient funds to return the Payment made by Household.

**RESPONSE:** Admitted, *See* D.E. 202, Ex. A.

Respectfully submitted,

**VER PLOEG & LUMPKIN, P.A.**



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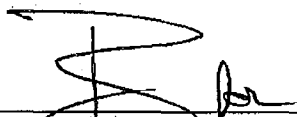
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*Co-Counsel for the Receiver*


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served *via* electronic mail this 6<sup>th</sup> day of August 2014 upon: all counsel of record identified on the attached Service List.

  
\_\_\_\_\_  
**Jason S. Mazer**

**VERIFICATION**

The undersigned swears under penalty of perjury that the foregoing Answers to Interrogatories are true and correct.

  
Melanie Damian

STATE OF FLORIDA           )  
  )  
COUNTY OF MIAMI DADE    )

BEFORE ME, the undersigned authority, personally appeared Melanie Damian, who is, personally known to me or has produced \_\_\_\_\_ as identification, and who, after being duly sworn, deposes and says that she executed the foregoing answers to Household Life Insurance Company's First Set of Interrogatories to Defendant Melanie Damian and that they are true, correct, and complete to the best of her knowledge.

Sworn to and subscribed before me on this 4<sup>th</sup> day of August, 2014.

  
\_\_\_\_\_  
NOTARY PUBLIC, STATE OF Florida  
MY COMMISSION EXPIRES:

